

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CASE NO.**

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KENDRA GARIEPY,  
Plaintiff,

Judge  
Magistrate Judge

vs.

TRANS UNION, LLC; EQUIFAX  
INFORMATION SERVICES, LLC,  
and CAINE & WEINER RESOURCE  
MANAGEMENT, LLC;  
Defendants.

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**TRANS UNION, LLC’S NOTICE OF REMOVAL**

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Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC (“Trans Union”) hereby removes the subject action from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court, District of Minnesota, on the following grounds:

1. Plaintiff Kendra Gariepy served Trans Union on or about March 15, 2022 with a Summons and Complaint to be filed in the 4th Judicial District Court, Hennepin County, Minnesota. Copies of the Summons and Complaint are attached hereto, as **Exhibit A**, and **Exhibit B**. No other process, pleadings or orders have been served on Trans Union.

2. Attached hereto, as **Exhibit D**, is a copy of Trans Union, LLC’s Notice of Filing Notice Of Removal With the United States District Court to be filed in Hennepin County District Court.

3. Plaintiff makes claims under, alleges that Trans Union violated and alleges that Trans Union is liable under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). See Complaint ¶¶ 44, 46, 48 and 50.

4. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

5. As of the date of this Notice of Removal, Defendants Experian Information Solutions, Inc. (“Experian”). Counsel for Trans Union has contacted counsel for Experian and Experian has consented to this removal as evidenced by Consents attached hereto as **Exhibit C**. Trans Union has no knowledge or information indicating that Caine & Weiner Resource Management, LLC has been served as of the date of this Notice.<sup>1</sup>

6. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the 4th Judicial District Court, Hennepin County, Minnesota, to the United States District Court for the District of Minnesota.

7. Notice of this removal will promptly be filed with the 4<sup>th</sup> Judicial District Court, Hennepin County, Minnesota and served upon all adverse parties.

WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from the 4<sup>th</sup> Judicial District Court, Hennepin County, Minnesota to this United States District Court, District of Minnesota.

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<sup>1</sup> Trans Union has made contact with Caine & Weiner Resource Management, Inc’s counsel, who indicated that Caine & Weiner Resource Management, Inc has not been properly identified in Plaintiff’s Complaint which renders service of process insufficient.

Respectfully submitted,

Date: April 4, 2022

/s/ Bradley D. Fisher

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*Counsel for Defendant Trans Union LLC*